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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

HAKIM BOND, PRO SE,
PLAINTIFF.

VS.

CA NO: 08cv4527

VISIONQUEST, AND THE
VISIONQUEST NATIONAL DIRECTOR
MAJOR SMITH, UNIT DIRECTOR,
COUNSELOR AND MEDICAL STAFF,
AND MR. MCGLAUHLIN ALL OF
VISIONQUEST, THE CLARION HOS-
PITAL AND THE TREATMENT TEAM,
DOCTOR PETER MEYER, AND THE
CHILDRENS HOSPITAL OF PHILA-
DELPHIA, THE CITY OF PHILADEL-
PHIA, THE PHILADELPHIA DE-
PARTMENT OF HUMAN SERVICES
DIRECTOR AND THE DIRECTOR OF
THE YOUTH STUDY CENTER, AND
THE PHYSICIAN AND MEDICAL
STAFF TO INCLUDE NURSES. AND
OTHER THERAPIST OR THE TREAT-
MENT TEAM, THE DIRECTOR OF
AND COMMUNITY BEHAVIORAL
HEALTH AND AMANDA LATSHAW AND
SABRINA BACKSTONE OF COMMUNI-
TY BEHAVIORAL HEALTH, AND THE
BENCHMARK BEHAVIORAL HEALTH
SYSTEMS AND THE DIRECTOR, AND
DR. JEROME VANCE, AND THERAPIST
MR. DAVE ASAY AND SUPERVISING
THERAPIST MR. DAVE GUYMAN.
DR. THMOAS,
DEFENDANTS.

FILED

SEP 25 2008
MICHAEL D. KUNZ, Clerk
By [Signature] Dep. Clerk

COMPLAINT

- (1). THE PLAINTIFF IS A RESIDENT OF PHILADELPHIA, PENNSYL-
VANIA.
- (2). THE RESIDENCES OF DEFENDANT(S) ARE UNKNOWN AND NOT RELE-
VANT FOR THE FILING OF THIS CIVIL ACTION TO THE KNOWLEDGE OF TH
PLAINTIFF IN THIS MATTER.

JURISDICTION

THIS COURT HAS JURISDICTION OVER THIS MATTER PURSUANT TO
U.S.C.(APPLICABLE) AND OR THAT DEEMED RELEVANT BY AND TO THE BEST
KNOWLEDGE AND LEGAL EXPERTISE OF THIS COURT.

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FACTS

1. ON, OR ABOUT MARCH 18, 2004, PLAINTIFF HAKIM BOND WAS TAKEN FROM A VISIONQUEST FACILITY IN WESTERN, PENNSYLVANIA, IN FRANKLIN, TO THE CLARION PSYCHIATRIC CENTER, IN CLARION, PENNSYLVANIA, AFTER HAVING SUFFERED A TRAUMATIC BRAIN INJURY AT THE VISIONQUEST JUVENILE PLACEMENT FACILITY.

2. PRIOR TO BEING TAKEN TO THE CLARION HOSPITAL, THE PLAINTIFF, ACCORDING TO STAFF, HAD BEGAN SHOWING SIGNS OF ABNORMAL BEHAVIOR OVER A PERIOD OF INNUMERABLE DAYS WHICH INCLUDED NOT EATING, DRINKING, SLEEPING, SPEAKING, OR FUNCTIONING PROPERLY.

3. THE RESPONSE OF THE STAFF, OR COUNSELOR, WAS TO TELEPHONE THE FATHER OF THE PLAINTIFF ON OR ABOUT MARCH 5, 2005, AFTER WHICH TIME THE PLAINTIFF WAS TRANSPORTED TO THE CLARION PSYCHIATRIC CENTER. NOTING THAT THE PLAINTIFF WAS UNABLE TO VERBALLY COMMUNICATE WITH HIS FATHER, MR. REGINALD CARTER.

3. THE PLAINTIFF FOUND OUT LATER THAT HIS FATHER DEMANDED THAT VISIONQUEST REMOVE PLAINTIFF FROM THEIR FACILITY AT ONCE AT THAT HE, THE FATHER WAS HEADED TO THE PHILADELPHIA OFFICE IN THE JUVENILE COURT BUILDING TO DEMAND ACTION.

4. PLAINTIFF HAKIM BOND'S BIRTHDATE IS SEPTEMBER 14, 1988, WHICH BRINGS HIM WITHIN THE STATUTE OF LIMITATIONS FOR THE REFILEING OF THIS CIVIL ACTION ACCORDING TO A WESTERN PENNSYLVANIA FEDERAL COURT JUDGE, THE HONORABLE MR. MCGLAUGHLIN.

5. DURING A CONFERENCE ONCE BETWEEN THE PLAINTIFF, HIS COUNSELOR, AND FATHER; THE FATHER INFORMED PLAINTIFF THAT IF HE SHOULD DO HIS BEST IN THE PROGRAM AND THAT IF HE, PLAINTIFF, HAD ANY COMPLAINTS AGAINST ANYONE, INCLUDING STAFF, THAT HE HAD THE CONSTITUTIONAL RIGHT TO FILE A COMPLAINT, TO WHICH THE FOREIGN BORN COUNSELOR COUNTERED, "THE ONLY RIGHT HE HAS IS TO DO WHAT I TELL HIM TO DO". PLAINTIFF'S COUNSELOR WENT ON TO SAY THAT IN HIS COUNTRY THERE WERE NO SUCH RIGHTS. TO WHICH PLAINTIFF DAD INFORMED HIM THAT HE WAS NOT IN HIS COUNTRY AND THAT WE, AMERICANS, ENJOYED SUCH RIGHTS.

5. VISIONQUEST IS A NATIONAL CORPORATE JUVENILE DELINQUENT FACILITY WHO UTILIZES EXTREME BOOT CAMP MEASURES, AND WHO IMPOSES INDIAN CULTURE AND PRACTICES ON YOUTH, MANY OF WHICH HAVE HAD DIFFICULT TIME COMPREHENDING THEIR OWN CULTURE, WHO UPON ENTRY IN TO THE FRANKLIN FACILITY ENCOUNTER MILITARISTIC, AND CULTURAL SHOCK.

6. THE FATHER OF PLAINTIFF DID GET TO THE PHILADELPHIA VISIONQUEST OFFICE AT THE JUVENILE COURT AT 1801 VINE STREET, WHERE HE SPOKE WITH SEVERAL STAFF MEMBERS WHO THEN TELEPHONED THE RURAL WESTERN PENNSYLVANIA FACILITY, WHO INFORMED THE COURTHOUSE OFFICE THAT THE PLAINTIFF HAD BEEN TRANSPORTED TO THE CLARION PSYCHIATRIC CENTER, IN CLARION PENNSYLVANIA, ALSO IN WESTERN PENNSYLVANIA.

7. ON SUNDAY, MARCH 21, 2005, PLAINTIFF'S FATHER ARRIVED AT THE CLARION PSYCHIATRIC CENTER, WHERE ACCORDING TO HIM, HE FOUND HIS FIFTEEN YEAR OLD, DISHEVELED, DIRTY, SMELLY, RAGED APPEARING, WALKING BAREFOOTED ON A COLD FLOOR, AND IN A STATE OF CATATONIA.

8. THE FATHER WAS INFORMED THAT THE PLAINTIFF WAS NOT EATING, DRINKING, OR COMMUNICATING, WHICH WAS OBVIOUS TO A SHOCKED FATHER AS HE WOULD LATER CONFIDE HIS STATE OF MIND TO HIS SON, OR PLAINTIFF AT A LATER DATE UPON SEEING HIS SON IN SUCH TRAUMATIC CONDITION.

THE PRESIDING DOCTOR AT THE CLARION PSYCHIACTRIC CENTER ADMINISTERED DRUGS INTO THE PLAINTIFF WITHOUT PARENTAL CONSENT, OR COURT ORDER IN VIOLATION OF MENTAL HEALTH RIGHTS.

9. A. THE DRUGS ADMINISTERED, WELBUTRIN, AND ZYPREXA, HAVE BEEN FOUND TO BE HIGHLY ADDICTIVE, TOXIC, AND LINKED TO SUICIDE AS A SIDE EFFECT AND WERE CAUSE FOR CIVIL LEGAL ACTION WHEREIN THE PHARMACUETICAL COMPANIE(S) SETTLED OUT OF COURT..THE DRUGS HAD ALSO BEEN LINKED TO DIABETES AND ORGAN FAILURE.

10. PLAINTIFF HAKIM BOND, WAS DISCHARGED IN A NEGLECTFUL WAY FROM THE CLARION PSYCHIACTRIC CENTER, TO THE YOUTH STUDY CENTER IN PHILADELPHIA WHERE HE ARRIVED IN A STATE OF CATATONIC SHOCK IN ABOUT EARLY APRIL, WHICH WILL BE INDICATED DURING THE DISCOVERY PROCESS.

11.A. WHILE IN BOOT CAMP, AND INDER UNBEARABLE PRESSURE, THE PLAINTIFF SIMPLY EXPLODED AND WAS RESTRAINED BY STAFF..PLAIN-TIFF BOND, THEN REFERRED TO AS TROOPER BOND, WAS UNDER EXTREME MENTAL AND EMOTIONAL PRESSURES.

12. IN BOOT CAMP, PALINTIFF WAS NOT ALLOWED TO TAKE PART IN CONGREGATIONAL PRAYERS DURING THE MONTH OG RAMADA, OR THE FAST-ING MONTH AND WAS TOLD THAT TO ALLOW SUCH WOULD GIVE THE APPEAR-ANCE OF HAVING FORMED A SEPARATE GROUP FOR MUSLIM YOUTH.

13. PLAINTIFFS DAD COMPLAINED TO THE PLACING JUDGE, THE HONOR-ABLE LORI DUMAS THAT THE VISIONQUEST STAFF WAS REQUESTING MONEY, OR DONATIONS ON A PREPAID, BY THE VISIONQUEST CORPRATION, OF FAMILY MEMEBERS WHO LOADED ONTO BUSES IN PHILADELPHIA..WHICH GOT BACK TO THE STAFF,, THE JUDGE HAVING REVEALED WHO MADE THE COM-PLAIN..THEREBY CAUSING A DEGREE OF HOSTILITY AGAINST THE DAD... IN ADDITION, ON ANOTHER OCCASSION, THE THE DAD HAD A DISAGREEMENT WITH MR. MCGLAUGHLIN OF THE PHILADELPHIA OFFICE WHO LATER, WITH OUT TELLING THE DAD, THAT HIS VISITS WERE CURTAILED..IN ADDITION, ANOTHER INDIVIDUAL FROM THE PHILADELPHIA OFFICE INFORMED THE SON THAT HIS FATHER SHOULD NOT COMPLAIN TO THE JUDGE AGAIN OR THERE WOULD BE NEGATIVE CONSEQUENCES..WITH A THREAT TO PLACE THE PLAIN-TIFF IN A HARD CORE STATE FACILITY. THIS WAS A DIRECT THREAT TO A FIFTEEN YEAR OLD WHO HAD NEVER BEFORE BEEN LOCKED AWAY OR AWAY FROM HOME FOR ANY LONG OERIOD OF TIME..AND WHO HAD BEEN REMOVED FORM A STATE FACILITY BECAUSE THE JUDGE AGREED WITH THE FATHER THAT FOR THE PLAINTIFFS FIRST PLACEMENT THAT THE STAE FACILITY WAS INAPPROPRIATE.

14. AT ONE TIME A YOUTH INFORMED THE PLAINTIFF OF CONFIDENTIAL INFORMATION IN HIS FILE, INDICATING A LACK OF SECURITY AND A VIO-LATION OF PRIVACY LAWS.

15. PLAINTIFF BOND ARRIVED AT THE YOUTH STUDY CENTER IN A STATE OF FULL DECOMPENSATION, AND IMMEDIATELY PALCED UNDER THE CARE OF DR. PETER MEYER, OF THE CHILDRENS HOSPITAL OF PHILADELPHIA, AND A TREAMENT TEAM.

16. THE YOUTH STUDY CENTER IS A YOUTH PRISON DETENTION CENTER OWNED BY PHILADELPHIA, AND OPERATED UNDER IT'S DEPARTMENT OF HUMAN SERVICES.

17. THOUGH COMPLETELY CAPABLE AND EMPOWERED, DR. PETER MEYER DECIDE NOT TO HAVE PALINTIFF BOND REMOVED FROM THE PRISON, AND TAKEN TO AN OUTSIDE HOSPITAL FACILITY FOR TREATMENT.

18. IN CLEAR VIEW OF DR. PETER MEYER, THE TREATMENT TEAM, AND ADMINISTRATOR CHERYL RANSOM GARNER, AND INNUMERABLE MEDICAL STAFF AND OTHER PERSONNEL, PLAINTIFF BOND WOULD, OVER A THREE MONTH PERIOD, ENDURE SEVERAL TORTUROUS STATES OF DECOMPENSATION TO INCLUDE BOUTS OF SHEER TERROR, OR FEAR, AND WAS UNABLE TO EAT, SLEEP, WASH, COMMUNICATE, OR OTHERWISE TAKE CARE OF HIMSELF AND WOULD BE VISITED BY HIS PARENTS ALMOST DAILY IN THAT STATE OF EXISTENCE..DURING THIS ENTIRE PERIOD, THE PLAINTIFF WAS NOT EVEN ADMITTED TO THE INFIRMARY AREA OF THE PRISON.

19. DURING LONG PERIODS OF CATATONIA, PLAINTIFF BOND WAS MEDICATED THOUGH NOT BEING NOURISHED.

20. AFTER TELEPHONING AND SPEAKING WITH A DR. AT THE YOUTH STUDY CENTER, PLAINTIFF WAS TAKEN OUT TO THE CHILDRENS HOSPITAL IN A STATE OF CATATONIA, AND OBVIOUS MENTAL DETERIORATION, AT WHICH TIME THE FATHER SPOKE WITH THE ATTENDING PHYSICIAN AND REQUESTED THAT HE HAVE PLAINTIFF HOSPITALIZED...THE DR. TOLD THE DAD THAT THE SON DID EAT AND THAT HE WOULD DO NOTHING IN TERMS OF MENTAL HEALTH. THE ATTENDING DR. WAS OF MIDDLE EASTERN DESCENT. NOTE: THE FATHER OF THE PLAINTIFF CALLED ON BEHALF OF THE SON AND SPOKE WITH A DR...ALSO, ONE OR TWO STAFF MEMBERS, NOT MEDICAL PERSONNEL, SPOKE UP FOR THE PLAINTIFF. STILL, HE WAS RETURNED TO THE DUNGEON TO ENDURE CRUEL AND UNUSUAL PUNISHMENT.

21. IN MID JUNE 2004, THE PLAINTIFF WAS SENT TO THE LAUREL RIDGE TREATMENT CENTER, FROM THE YOUTH STUDY CENTER WHERE HE ARRIVED IN A STATE OF CATATONIA.

22. BY KEEPING THE PLAINTIFF AT THE YOUTH STUDY CENTER, DR. PETER MEYER OF THE CHILDRENS HOSPITAL OF PHILADELPHIA, AND THE TREATMENT TEAM, AND ADMINISTRATORS AND OTHER THERAPIST UNDER THE DEPARTMENT OF HUMAN SERVICES OF PHILADELPHIA, AND OTHER PRIVATELY OWNED CORPORATIONS WERE ABLE TO PROFIT ON A DAILY BASIS WHILE IMBEDDING PLAINTIFF BOND WITH TERROR AND MENTAL INSTABILITY WHICH COULD HAVE A LIFETIME OF DETRIMENTAL EFFECTS, OUTSIDE OF HAVING BEEN INFORMED BY MEDICAL PROFESSIONALS THAT THE VARIOUS DIAGNOSIS CONSTITUTED A LIFETIME CHALLENGE.

23. STAFF MEMBERS AT VISIONQUEST HAD DIAGNOSED THE PLAINTIFF WITH DEPRESSION PRIOR TO TELEPHONING HIS DAD AND EVENTUALLY, OR AT THE DAD'S INSISTENCE, TAKEN PLAINTIFF TO THE HOSPITAL.

24. PLAINTIFF, WHILE AT CLARION, WAS DIAGNOSED WITH CATATONIA, AND DEPRESSION.

24. THE VISIONQUEST ENVIRONMENT WAS AGGRESSIVE AND UNRULY WITH FIGHTS ALL OF THE TIME, AND MASS ESCAPES.

25. BEING SEVEN OR EIGHT HOURS AWAY FROM HOME AND CUT OFF FROM HIS FATHER AND MOTHER, IN AN UNSAFE MILITARISTIC, AND HOSTILE ENVIRONMENT IN RURAL PENNSYLVANIA, AND UNDER THREAT OF PENALTY FROM VISIONQUEST PERSONNEL TRAUMATIZED PLAINTIFF WHO ATTEMPTED TO ADAPT AS HE WAS A MONTH OR SO FROM BEING DISCHARGED TO GO HOME FROM VISIONQUEST, ALL PROVED TO BE UNBEARABLE AND BROKE THE PLAINTIFF DOWN.

26. PLAINTIFF HAD NOT BEFORE HIS COLLAPSE AT VISIONQUEST ENDURED ANY CATASTROPHIC MENTAL ILLNESS, OR BRAIN INJURY.

27. VISIONQUEST FAILED TO PROVIDE A SAFE ENVIRONMENT FOR THE FIFTEEN YEAR OLD PLAINTIFF, AND THEN FURTHER NEGLECTED HIM AFTER THEY BROKE HIM DOWN.

28. AFTER A DISAGREEMENT BETWEEN THE FATHER OF THE PLAINTIFF WITH DR. SINGAL OF THE FAIRMOUNT BEHAVIORAL FACILITY, WHERE THE PARENTS OF THE PLAINTIFF PLACED HIM, WITH THE MOTHERS PRIVATE INSURANCE, SABRINA BACKSTONE, AND AMANDA LATSHAW DECIDED TO CONTACT A PROBATION OFFICER, AND A DHS WORKER AND SEEK THEIR ASSISTANCE IN CALLING FOR AN EARLY COURT DATE AS PLAINTIFF WAS ON PROBATION AT THE TIME. THE DHS WORKER, MRS. EVENLYN PARKER REFUSED TO GO ALONG WITH THE ACTION. IN FACT, AMANDA LATSHAW, WAS INSTRUMENTAL IN HAVING PLAINTIFFS CASE TRANSFERRED TO THE HEAD JUDGE IN THE JUVINILE SYSTEM WHO WAS KNOWN TO BE HARSH, AND THUS FELT BY MANY.

29. ON THE DAY THAT THE PLAINTIFF WAS TO ENTER INTO THE COURTROOM OF JUDGE DOUGHERTY, HE DECOMPENSATED DIRECTLY OUTSIDE OF THE COURT AND AND COULD NOT RESPOND ONCE INSIDE THE COURTROOM DUE TO CATTONIC SHOCK WHICH OCCURED IN FRONT OF MANY PEOPLE.

30. PRIOR TO THEIR ACTIONS, NEITHER AMANDA LATSHAW, OR SABRINA BACKSTONE ATTEMPTED TO CONTACT THE PLAINTIFF OR HIS PARENTS TO ADVISE THEM OF HER ACTIONS THUSLY BLATANTLY DENYING PATIENTS RIGHTS AND DUE PROCESS OF LAW AND EQUAL PROTECTION RIGHTS, NOT TO MENTION BASIC HUMAN CONSIDDRATION.

31. THE ACTIONS OF SABRINA BACKSTONE AND AMANDA LATSHAW RESULTED IN THE IMMEDIATE PLACEMENT OF THE PLAINTIFF IN THE YOUTH STUDY CENTER PRISON, WHERE HE HAD TO BE TAKEN TO AND HOSPITALIZED IN THE HORSHAM CLINIC, WHICH IS BELIEVED TO HAVE BEEN ACHIEVED, IN PART, BECAUSE DR. PETER MEYER AND THE CHILDRENS HOSPITAL OF PHILADELPHIA NO LONGER HAD THE MENTAL HEALTH PROVISION CONTACT.

32. IN ADDITION, THE ACTIONS OF THE COMMUNITY BEAIVORAL HEALTH EMPLOYEES LEAD TO FURTHER HOSPITALIZATIONS AND PLACEMENTS, TO INCLUDE IMPRISONMENT AT A JUVINILE STATE FACILITY WHEREIN THE PLAINTIFF ENDURED GREAT DIFFICULTY, AND SEPARATION FROM HOME IN UTAH.

33. THE INITIAL MENTAL AND EMOTIONAL COLLAPSE LED THE PLAINTIFF TO BE PLACED IN A FACILTY IN TEXAS, THE LAUREL RIDGE TREAMENT CENTER..AS WELL AS THE HORSHAM CLINIC IN PHILADELPHIA, THE FRIEND HOSPITAL, AND MORE HARMFUL MEDICATIONS AND MISTREATMENT AND NEGLECT.

34. THE PLAINTIFF WAS PLACED WITH THE WORDSWORTH INSTITUTION, A AND BENCHMARK IN WOODSCROSS UTAH, AS A RESULT OF COMMUNITY BEHAVIORAL HEALTH..AND THE CRESSON JUVINILE STATE FACILITY.

35. DR. THMAS, OF THE HORSHAM CLINIC..DR. THOMAS ALSO PERFORMED EVALUATIONS FOR MENTAL HEALTH FOR THE JUVINILE COURT, DESIGNATED PLAINTIFF BON BOND CONDUCT DISORDER DELINQUENT, WITHOUT EITHER HIS PARENTS, OR HIS KNOWLEDGE WHICH LED, OR PERMITTED A PREJUDICIAL PLACEMENT AT THE BENCHMARK FACILITY IN UTAH.

35. THE PLAINTIFF WAS HARRASSES AND PROVOKED AND FAILED MISERABLY AND ESCAPED THE NEGLECT AT WORDSWORTH.

36. HAVING BEEN PROFILED, UNKNOWINGLY, AS CONDUCT DISORDER DELINQUENT..IN CONTRAST TO HAVING SUFFERED ACUTE CATATONIA, DEPRESSION, PARANOID SCHIZOPHRENIA, AND BI POLAR..THE TREATMENT TEAM AT BENCHMARK NEVER SPECIFICALLY TREATED PLAINTIFF FOR HIS UNDERLYING MENTAL ILLNESS. IN ADDITION, THEY HAD NO TRAINING IN CULTURAL SPECIFICATION WHICH ENABLED THEM TO UNDERSTAND AFRICAN AMERICAN YOUTH FROM PHILADELPHIA.

37. BENCHMARK, IN WOODSCROSS, UTAH, PRACTICED RACISM AND EVEN HAD A PREDOMINANTLY, OR ALL WHITE UNIT AT ONE TIME.

38. UPON LEARNING THAT PLAINTIFF WAS PARTY TO THE FIRST ENDEAVOR FOR THIS CIVIL ACTION, MY DR. ABRUPTLY, REMOVED ME, PLAINTIFF FROM MEDICATION, AFTER HAVING IGNORED MY FATHERS CONCERNS FOR MONTHS, WHICH PRECIPITATED A CRASH WHICH LED TO AGGRESSIVE BEHAVIOR, AND INSTABILITY...AFTER SUCH AN EPISODE, THE DR. PLACED ME BACK ON THE DRUG, ME REFERRING TO PLAINTIFF.

39. THOUGH THE TREATMENT TEAM NEVER RECOGNIZED AND OR TREATED PLAINTIFF FOR HIS UNDERLYING MENTAL ILLNESS, THEY WERE SURE TO MISTREAT AND RESTRICT HIS RIGHTS AND PRIVILEGES WHICH RESULTED IN PHYSICAL PROVOCATION, A BROKEN HAND, ILLEGAL INTERROGATION BY SUPERVISOR DAVE GUYMAN LCSW, AN ARREST, AND A NEGATIVE TRANSFER OUT OF THE FACILITY WHEREUPON BENCHMARK TOOK ABSOLUTE LY NO RESPONSIBILITY FOR THE GROSS FAILURE OF THE PLAINTIFF.. PLAINTIFF WAS ARRESTED IN UTAH, NO CHARGES WERE FILED, HE WAS TAKEN TO A HOSPITAL WHERE THE ATTENDING PHYSICIAN DID NOT REPAIR HIS BROKEN HAND..NEITHER DID BENCHMARK TAKE HIM TO ANOTHER HOSPITAL FOR TREATMENT...THE STAFF AT BENCHMARK WAS RACIALLY PREJUDICED TOWARD THE PLAINTIFF.

40. PLAINTIFF BOND WAS ADMITTED TO BENCHMARK ON JUNE 7, 2006, AND DISCHARGED ON MARCH 2, 2007.

41. PLAINTIFF BOND, MANAGED TO DO PRETTY GOOD IN SOME OF THE PLACEMENTS AND HOSPITALS, INCLUDING THE LAUREL RIDGE TREATMENT CENTER IN TEXAS..IN THIER DISCHARGE SUMMARY, AND IN ORDER TO SUPPORT THIER PREJUDICIAL AND HEAVILY CONVOLUTED CLAIMS, BENCHMARK STATES IN THIER DISCHARGE SUMMARY THAT THE PLAINTIFF FAILED BECAUSE HIS FATHER MINIMIZES HIS NEEDED FOR TREATMENT, WHICH IS A TOTAL LIE..THEY MENTION LAUREL RIDGE AS A PLACE OF FAILURE..... AND THEY NEVER TAKE ANY RESPONSIBILITY.

42. NOWHERE IN THE BENCHMARK SUMMARY, DOES IT MENTION THAT PLAINTIFF BOND WAS BEING TREATED FOR MENTAL ILLNESS...THIS NOTION IS A PRIMARILY RACIST BASED FARCE TO CRIMINALIZE, DISENCHANT, AND DESTROY AFRICAN AMERICAN YOUTH..SUMMARY IS ATTACHED HERETO...AS WELL AS A LETTER FROM LAUREL RIDGE PRAISING THE PLAINTIFF..AND THERE IS A NEWSPAPER ARTICLE FROM NEW JERSEY TELLING HOW THIER DR DOCTORS MUST LEARN RACIAL SENSITIVITY TO CUT DOWN ON PREJUDICE... AND A NATIONAL ORGANIZATION WHICH SPEAKS TO PREJUDICE IN MENTAL HEALTH TREATMENT AGAINST AFRICAN AMERICANS.

43. DR. THOMAS OF FAMILY COURT, 1801 VINE STREET, EVALUATED THE PLAINTIFF AND CLASSIFIED HIM AS CONDUCT DISORDER DELINQUENT WITHOUT INFORMING EITHER HIM OR HIS PARENTS OF THE RAMIFICATIONS OF THE SAME, SUBJECTING HIM TO BEING PLACED AND BEING ABUSED AND FAILING AT BENCHMARK BEHAVIORAL HEALTH SYSTEMS.

THE ACTIONS OF THE DEFENDANTS HAVE CAUSED IRREPARABLE DAMAGE TO THE PLAINTIFF AND PUT HIM IN A SITUATION WHERE HE WILL NEED A LIFETIME OF CARE WHICH COULD, AND MOST PROBABLY WILL INCLUDE VARIOUS MEDICATIONS FROM TIME TO TIME. IT HAS BEEN REPORTED THAT THE LIVES OF MOST MENTAL HEALTH PATIENTS ARE SEVERLY MARGINALIZED AND SHORTENED. TIL TODAY, PLAINTIFF SUFFERES BOUTS OF DECOMPESA- AND A FEAR BASED ON THE KNOWLEDGE THAT HE CAN BE BOTH NEGLECTED AND MISTREATED IN THE FIELD OF MENTAL HEALTH. VISIONQUEST AND DR. PETER MEYER OF CHILDRENS HOSPITAL, THE YOUTH STUDY CENTER AND RELATED DEFENDANTS, AND COMMUNITY BEHAVIORAL HEALTH AND BENCHMARK ALL ACTED EITHER IN COLLUSION, OR SEPARATELY TO DENY MEDICAL RIGHTS AND PERSONAL DECISION MAKING, AND CONSTITUTIONAL RIGHT TO THE PLAINTIFF WITHIN THE BOUNARIES OF THE JUVINILE JUSTICE SYSTEM WHICH CONSTITUTED CRUEL AND UNUSUAL PUNISHMENT, PARTICULARLY AT VISIONQUEST, THE YOUTH STUDY CENTER UNDER DR. PETER MEYER AND THE CHILDRENS HOSPITAL OF PHILADELPHIA.. BOTH DEFENDANTS AMANDA LARSHAW AND SABRINA BACKSTONE, IN PARTICULAR, MISUSED THIER POSITIONS AS EMPLOYESS OF A MENTAL HEALTH PROVIDER , COMMUNITY BEHAVIORAL HEALTH, TO HAVE THE PLAINTIFF UNJUSTLY, AND WITHOUT EVER

COMMUNICATING WITH HIM, AND PREVENTING HIM FROM USING HIS PRIVATE INSURER, MAGELLAN, TO RECIEVE MEDICAL CARE AS SOUGHT AFTER BY HIS PARENTS...IN ALL INSTANCES, RACIAL PROFILING CAME INTO PLAY.

INSTITUTIONS THAT OUR COMMUNITY DEPENDS ON TO TREAT THE DISADVANTAGED ARE DISSERVED WHEN AN INDIVIDUAL SUCH AS THE PLAINTIFF IS CAUSED TO ENDURE GROSS MISTREATMENT..THIS CANNOT BE ALLOWED TO HAPPEN AS INDIVIDUALS, CORPORATIONS, AND THE MINICIPALITIES AND STATES MUST BE HELD TO A HIGH DEGREE OF ACCOUNTABILTY, AND MUST DEMAND OF THEMSELVES A CONTINUAL OVERSIGHT TO MAKE SURE THAT THOSE THOSE UNDER THIER SOVERIGN UPHOLD THE RIGHTS OF ALL INDIVIDUALS WHETHER UNDER THE AUSPICES OF COURT ORDER, OR ANYTHING ELSE.

THEY HAVE LIBELED, SLANDERED, AND DEFAMED THE CHARACTER OF THE FATHER OF THE PLAINTIFF WHO AT ALL TIMES HAS ENDEAVORED TO BE HELPFUL, AND WHO, AS A DYNAMIC AND OUTSPOKEN MAN HAS BEEN SHUNED, AND WORSE STILL, SEVERAL OF THE DEFENDANTS, ESPECIALLY SABRINA BACKSTONE, AND AMANDA LARSHAW OF COMMUNITY BEHAVIORAL HEALTH, HAVE MISTREATED THIS PLAINTIFF BECAUSE HIS FATHER HAS BEEN DILIGENT IN FIGHTING FOR HIM-ALL OF HIS LIFE, NOT JUST WITHIN THE JUVINILE SYSTEM..BUT EVEN IN HIS SCHOOL AS THE HOME AND SCHOOL ASSOCIATION PRESIDENT.

AT ALL TIMES, THE DEFENDANT(S) ACTED UNDER COLOR OF THIER RESPECTIVE STATE LAWS.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGEMENT AGAINST THE DEFENDANTS FOR DAMAGES AS FOLLOWS: DEFENDANTS-VISIONQUEST SHALL PAY BOTH COMPENSATORY, AND PUNITIVE DAMAGES RESPECTIVELY IN THE AMOUNTS OF: ONE MILLION, AND TEN MILLION, DOLLARS.

DEFENDANT CLARION HOSPITAL SHALL PAY BOTH COMPENSATORY, AND PUNITIVE DAMAGES IN THE AMOUNTS OF FIVE HUNDRED THOUSAND, AND ONE MILLION DOLLARS.

THE ATTENDING MEDICAL DR. OF CLARION, SHALL PAY BOTH COMPENSATORY AND PUNITIVE DAMAGES AS FOLLOWS, IN THE AMOUNTS OF: ONE HUNDRED THOUSAND, AND ONE MILLION DOLLARS.

DEFENDANTS DR. PETER MEYER, AND THE CHILDRENS HOSPITAL OF PHILADELPHIA SHALL PAY BOTH COMPENSATORY, AND PUNITIVE DAMAGES, RESPECTIVELY IN THE AMOUNTS OF: ONE HUNDRED THOUSAND, AND ONE MILLION DOLLARS, AND TEN MILLION DOLLARS, THE TEN MILLION BEING DESIGNATED FOR THE CHILDRENS HOSPITAL.

DEFENDANT(S), THERAPIST, OR TREATMENT TEAM AND THEIR PARENT CORPORATION.. SHALL COMBINE COMPENSATORY AND PUNITIVE DAMAGES IN THE AMOUNT OF: FIVE HUNDRED THOUSAND DOLLARS.

DEFENDANT THE DEPARTMENT OF HUMAN SERVICES OF PHILADELPHIA, AS THE YOUTH STUDY CENTER UNDER THE AUSPICES OF PHILADELPHIA COUNTY, SHALL COMBINE PUNITIVE AND COMPENSATORY JUDGEMENTS AS FOLLOWS: ONE HUNDRED THOUSAND AND ONE MILLION DOLLARS RESPECTIVELY.

DEFENDANT PHILADELPHIA, AS SOVEREIGN OF THE DEPARTMENT OF HUMAN SERVICES SHALL COMBINE COMPENSATORY, AND PUNITIVE DAMAGES IN THE RESPECTIVE AMOUNTS OF: ONE HUNDRED THOUSAND AND ONE MILLION DOLLARS, RESPECTIVELY.

DEFENDANT(S) DOCTOR(S), MEDICAL STAFF AT THE YOUTH STUDY CENTER OUTSIDE OF THE MENTAL HEALTH DEPARTMENT, TO PAY AS A PRIVATE PRACTICING DOCTOR IN THE AMOUNT OF: ONE HUNDRED THOUSAND DOLLARS IN BOTH PUNITIVE, AND COMPENSATORY DAMAGES... OTHERS SHALL HAVE THEIR PAYOUTS INCLUDED IN THE GENERAL PAYOUT UNDER THE DEPARTMENT OF HUMAN SERVICES-THE CITY OF PHILADELPHIA.

DEFENDANT BENCHMARK BEHAVIORAL HEALTH SYSTEM SHALL PAY OUT THE AMOUNT OF: ONE MILLION DOLLARS, AND TEN MILLION DOLLARS RESPECTIVELY FOR BOTH COMPENSATORY AND PUNITIVE DAMAGES.
DR. JEROME VANCE SHALL PAYOUT ONE MILLION DOLLARS.

THE RESPECTIVE STATES OF BOTH UTAH, AND PENNSYLVANIA SHALL PAYOUT FOR THEIR DEPARTMENTS OF PUBLIC WELFARE, AND OR THEMSELVES, THE AMOUNTS OF: TEN MILLION DOLLARS EACH.. FOR PAIN AND SUFFERING AND A LIFETIME BRAIN INJURY AS THE OVERSEERS OF THOSE UNDER THEIR SOVEREIGN DOMAIN...AND FOR SUCH OTHER RELIEF THIS COURT DEEMS JUST

NOTE: DR. THOMAS IS SUED FOR A TOTAL AMOUNT OF ONE HUNDRED THOUSAND DOLLARS FOR BOTH PUNITIVE AND COMPENSATORY DAMAGES, AS A DEFENDANT.

A JURY TRIAL IS REQUESTED BY THE PLAINTIFF.

DATE: SEPTEMBER 12, 2008

RESPECTFULLY SUBMITTED


HAKIM BOND

HAKIM BOND C/O REGINALD CARTER
1937 W. ROWAN STREET
PHILADELPHIA, PA 19140
PHONE: 215 239 8180

CONTACT INFORMATION SHEET

Civil Action No.: _____
HAKIM BOND

Name: _____
(Please print)

Address: 1937 W. ROWAN STREET
PHILADELPHIA, PA. 19140

3

Phone #: 215 239 8180
(Include area code)

E-mail address: _____

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

v.

CIVIL ACTION

NO.

MOTION TO PROCEED IN FORMA PAUPERIS



Signature

1937 W. ROWAN STREET

Address

PHILA. PA. 19140
HAKIM BOND

Print your name

STATEMENT IN SUPPORT OF REQUEST TO PROCEED IN FORMA PAUPERIS

HAKIM BOND

Full name of Plaintiff

v.
NATIONAL DIRECTOR, ET AL

Civil Action No. _____

Defendant(s)

HAKIM BOND

I, _____, declare under the penalty of perjury, that I am the plaintiff in the above-entitled case; that in support of my motion to proceed without being required to prepay fees, costs, or give security therefor, I declare that because of my poverty I am unable to pay the costs of said proceeding or to give security therefor and that I believe I am entitled to relief.

1.) Are you presently employed? Yes ☐ No ☒

a.) If the answer is "yes", state the amount of your salary or wages per month, and give the name and address of your employer. _____

b.) If the answer is "no", state the date of last employment and the amount of the salary and wages per month which you received.

Not available - will produce later
last employment October 2007

2.) Have you received within the past twelve months any money from any of the following sources?

a.) Business, profession, or form of self-employment?

Yes ☐No ☒

b.) Rent payments, interest, or dividends?

Yes ☐No ☒

c.) Pensions, annuities, or life insurance payments?

Yes ☐No ☒

d.) Gifts or inheritances?

Yes ☐No ☒

e.) Any other sources?

Yes ☐No ☒

If the answer to any of the above is "yes", describe each source of money and state the amount received from each during the past twelve months. _____

3.) Do you own cash, or do you have money in a checking or savings account? Yes ☐ No ☒
If the answer is "yes", state the total value of the items owned. _____4.) Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)? Yes ☐ No ☒
If the answer is "yes", describe the property and state its approximate value. _____5.) List the persons who are dependent upon you for support, state your relationship to those persons, and indicate how much you contribute toward their support. NONE

I declare under the penalty of perjury that the foregoing is true and correct.

EXECUTED ON SEPT., 12, 2008

(Date)

Hakim Bond

(Plaintiff's Signature)

WY

Page 5-A

08cv4527

N.J. doctors to accrue culture

New legislation requires M.D.s to complete cultural sensitivity class

By Angela Delli Santi

TRENTON, N.J. — Barbara Eckstein does not want to be the kind of doctor who treats some patients better than others.

The 30-year-old medical student believes a new law requiring doctors to complete cultural sensitivity training before practicing medicine in New Jersey will help teach physicians to care for all their patients equally well.

"There's a core group of believers now who understand how important this is," said Eckstein, a Nutley resident and senior at New Jersey Medical School in Newark. "The key is to get the rest of the medical community to recognize it and to not feel threatened by it."

The state Legislature wrote a new prescription for the state's physicians by approving a measure requiring M.D.s to be culturally competent as a condition of getting — or keeping — their medical licenses.

When acting Gov. Richard J. Codey signed the bill into law late last month, he noted the importance of having doctors that recognize the prevalence of high blood pressure, asthma, AIDS and other diseases among some minority communities.

"This new law will help provide equality in medical care by requiring that New Jersey physicians take special training to diagnose and treat conditions that are prevalent among minorities," Codey said.

curriculum in the state's medical colleges will have to include instruction in cultural competency designed to address race- and gender-based disparities in medical treatment.

It hasn't been decided how the training will be implemented — it could be a required lecture, online course or something else — but all doctors in the state will have to complete the requirement before they are licensed or relicensed. New Jersey doctors renew their medical licenses every two years.

Officials with the Board of Medical Examiners, which sets standards for medical licenses in New Jersey, would not comment before meeting later this month to discuss how the law will be implemented, said board spokesman Jeff Lamm.

The Federation of State Medical Boards, a national medical regulatory authority, said New Jersey is believed to be the first state to require cultural competency as a condition for licensure.

California passed the Cultural and Linguistic Competency of Physicians Act of 2003, creating a voluntary program for physicians and surgeons to learn a foreign language and cultural beliefs that could impact patient health care. Lawmakers in Arizona, California and New York, meanwhile, have introduced legislation this year requiring cultural competency. A bill pending in Illinois would create a voluntary cultur-

EXHIBIT 'C'



**Message from Margaret Stout
President NAMI Board of Directors**

Recent research points to significant disparities in health care for African Americans in the United States. These studies conclude that mental health outcomes for this population are far bleaker than outcomes for Caucasians. According to researchers at Harvard University, in areas ranging from diabetes to mental health, African Americans receive WORSE medical care than their white counterparts. That study, released March 13, 2002 in the Journal of the American Medical Association, concluded that the largest gaps in the delivery of quality care were found in the mental health arena. According to the report, blacks released from inpatient mental health care received follow-up care 33 percent of the time, compared with 54 percent for whites. This data as well as data from the Surgeon General's 2001 Report, *Mental Health: Culture, Race and Ethnicity*, address one of the most unfortunate realities of our time: African Americans, and other communities of color in the United States, face significant barriers to quality mental health care.

One of the guiding principles driving the work of NAMI organizations at the national, state, and local levels is improving access to treatment for individuals and families affected by mental illness. Therefore, it is only appropriate for NAMI to develop strategies that will address the many barriers faced by African Americans.

The purpose of this manual is to provide valuable information about the current mental health status of the African American community and resources for NAMI and other organizations who want to engage this community in a meaningful and culturally appropriate manner.

On behalf of the NAMI Board of Directors, I want to thank our African American NAMI leaders for all OF their work and dedication. Their commitment and hard work truly makes us the Nations Voice on Mental Illness.

Margaret Stout

President

NAMI National Board of Directors

Rev 4527

WY

1937 W. ROWAN STREET
PHILA., PA. 19140

THE DIRECTOR OF THE
DEFENDERS ASSOCIATION OF PHILADELPHIA
AND LUNA PATTELA, ASSISTANT
CHIEF MENTAL HEALTH UNIT
ASSISTANT DEFENDER
441 SANSOM STREET
PHILADELPHIA, PA. 1910

SEPTEMBER 16, 2008

RE: HAKIM BOND #PP 948291

TO THE DIRECTOR AND
LUNA PATTEL:

AT THIS PARTICULAR TIME FURTHER INVOLVMENT WITH MY SON, HAKIM BOND'S CASE WOULD CONSTITUTE A CONFLICT OF INTEREST IN THAT THIS OFFICE COULD FACE A CIVIL SUIT REGARDING HIM.

ON JULY 22, 2008, LUNA PATTEL DID INFORM THE FATHER, MYSELF, OF HAKIM BOND THAT YOU AGREED WITH THE DOCTORS AT THE PHILADELPHIA DETENTION CENTER THAT HAKIM WAS INCOMPETENT BECAUSE HE WAS UNCOOPERATIVE-IN THAT HE WOULD NOT SIGN OFF ON PAPERS TO HAVE HIS MENTAL HEALTH RECORDS RETIEVED. BEING UNCOOPERATIVE, IN AND OF ITSELF DOES NOT CONSTITUTE INCOMPETENCE.

ON JULY 30, 2008, LUNA PATTEL AUTHORED A LETTER TO HAKIM BOND, WHERE IN THE LAST PARAGRAPH, SHE WRITES, "PLEAS CONTINUE WITH YOUR TREATMENT AND, HOPEFULLY, AT THE NEXT LISTING YOUR CASE WILL MOVE FORWARD.". BE ADVISED THAT HAKIM IS NOT ENGAGED IN, NOR HAS HE EVER BEEN ENGAGED IN ANY SORT OF TREATMENT WITHIN THE PHILADELPHIA PRISON SYSTEM..SO WHERE IS YOUR INFORMATION COMING FROM, AND HOW COULD YOU ONCE AGAIN COME TO AN ERRONEOUS CONCLUSION..IN THE SECOND OF TWO MAJOR ISSUES, THE FIRST BEING A MATTER OF COMPETENCY?

IF THIS OFFICE GOES FORWARD AT THIS PARTICULAR TIME WITH INVOLVEMENT WITH MY SON YOU WILL FACE A LAW SUIT.

YOU ARE REQUESTED THAT YOUR OFFICE WITHDRAWS FROM REPRESENTATION RELATED TO THE COURT DATE OF SEPTEMBER 18, 2008.

SINCERELY YOURS

Reginald Carter
REGINALD CARTER

Hand delivered 9/17/08

**DEFENDER ASSOCIATION
OF PHILADELPHIA**

1441 Sansom Street
Philadelphia, PA 19103
(215) 568-3190

ELLEN T. GREENLEE
DEFENDER

July 30, 2008

Mr. Hakim Bond PP #948291
P.I.C.C.
8301 State Road
Philadelphia, PA 19136

Dear Mr. Bond:

The Defender Association of Philadelphia represented you in the above-captioned matter on July 22, 2008 in Courtroom 504 at the Criminal Justice Center, 1301 Filbert Street, Philadelphia, PA. Your case was continued until September 18, 2008 in Courtroom 504 at the Criminal Justice Center for status of mental health only.

As you were found incompetent to proceed with your case, your matter was continued. Please continue with your treatment and, hopefully, at the next listing your case will move forward.

If you have any questions, please call me at 215-568-3190.

Sincerely,



Luna Patel
Assistant Chief
Mental Health Unit
Assistant Defender

LP/mr